

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)
PA/DC SECTION

MAR 7 1995

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

P A D 0 0 2 2 EPA REGION 7 5 0

II. Name of Installation (Include company and specific site name)

AVERY DENNISON-SOABAR SYSTEMS

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

7 7 2 2 D U N G A N R D

Street (Continued)

City or Town

P H I L A D E L P H I A

State

P A

Zip Code

1 9 1 1 1 -

County Code

1 0 1

County Name

P H I L A D E L P H I A

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

S A M E

City or Town

State

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

B E A T Y

(First)

K E V I N

Job Title

D I R E C T O R , E H S

Phone Number (Area)

2 1 5 - 7

VI. Installation Contact Address (See Instructions)

A. Contract Address
Location Mailing Other☒ ☐ ☐

B. Street or P.O. Box

City or Town

State

Zip Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

AVERY DENNISON CORP.

Street, P.O. Box, or Route Number

1 5 0 N O R T H O R A N G E G R O V E B L V D.

City or Town

P A S A D E N A

State

C A

Zip Code

9 1 1 0 3 -

Phone Number (Area Code and Number)

8 1 8 - 3 0 4 - 2 0 0 0

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes ☐

X No

(Date Changed)

Month

Day

Year

THE OLD NAME IS ...
AVERY SOABAR PRODUCTS (CORP.)
THE NEW NAME IS ...
AVERY DENNISON-SOABAR SYSTEMS
NAME NOT DEF 8/10/95
GEN

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
- ☒ b. 100 to 1000 kg/mo (200-2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify

- ☐ 3. Treater, Storer, Disposer (at Installation) Note: A permit is required for this activity; see Instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Boiler and/or Industrial Furnace
- ☐ 1. Smelter Referral
- ☐ 2. Small Quantity Exemption
- Indicate Type of Combustion Device(s)
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
- ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
- ☐ a. Utility Boiler
- ☐ b. Industrial Boiler
- ☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- ☐ a. Process
- ☐ b. Re-refine

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☒ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
- ☐ ☐ ☐ ☐ + D006 D008 D018 D035

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number; See Instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature



Name and Official Title (Type or print)

 KEVIN M. BEATTY
DIRECTOR, EHS

Date Signed

3/2/95

XI. Comments

THIS NOTIFICATION IS BEING FILED TO CHANGE STATUS FROM
A "LARGE QUANTITY GENERATOR" TO A "SMALL QUANTITY GENERATOR"

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



**ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

⁺
PAD002277150

08/08/95

INSTALLATION ADDRESS

AVERY DENNISON SOABAR SYS
7722 DUNGAN RD
PHILADELPHIA , PA 19111
KEVIN BEATY DIRECTOR EHS

7722 DUNGAN RD
PHILADELPHIA , PA 19111

Hazardous Waste Inspection Report
Generators - Part A

Can.

Date of inspection 1-31-90 Time start 9:00 AM Time finish 11:45
 Name of inspector Robert Zang
 Company, installation name Avery / Soabar Products Group
 Location 7722 Dungan Road
 County Phila. Municipality Phila.
 Identification number PAD 00 22 77 150
 Name of responsible official D. Kent Tippy
 Title Group V.P.
 Mailing address 7722 Dungan Rd., Phila., PA - 19111
 Area code and telephone number 215 - 728-8936
 Name of person interviewed Alonzo Humphrey
 Title Safety Engineer
 Mailing address (if different from above) same
 Area code and telephone number "

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☒ storage, ☐ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☒ reclaim
- SAFETY-KLEEN* → *IND. SOLVENTS & CHEMICAL*

2. Amount of hazardous waste produced:

- a. ca. 3,000 avg. kg./mo. *and large quantity (>1000 kg)*
 b. ca. 36,000 avg. kg./yr. *shipments are made.*

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
	<i>Safety Kleen</i>	<i>Tullytown, PA - recycling</i>
	<i>Safety Kleen</i>	<i>Tullytown, PA - recycling</i>

Mr. Humphrey
granted permission
to inspect.

Hazardous Waste Inspection Report
Generators - Part B

Query/Sorbar

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance	Chapter Citation
Status				REQUIREMENT			75.262
1	2	3	4				
X				Hazardous waste determination, copies available			(b)
X				Identification number			(c)(1)
X				Hazardous waste shipments offered only to licensed transporters			(c)(4)
X				Authorization received from TSD facility for wastes shipped off-site			(d)
X				PA manifest used for intrastate shipments			(e)(2)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments			(e)(3)
X				Manifests filled out properly and completely			(e)(7)
		X		Manifests routed properly and within time limits (7 days)			(e)(14) or (15)
		X		Proper U.S. DOT shipping containers or packages			(f)(1)(i)
		X		Shipping containers marked and labeled according to U.S. DOT			(f)(1)(ii)
X				Containers of 110 gal. or less marked with required PA label			(f)(1)(iii)
X				Placards offered to transporter			(f)(2)
X				Wastes accumulated on-site for less than 90 days			(g)(1)(i)
	X			Wastes stored in proper containers and properly marked and labeled			(g)(1)(ii)
		X		Containers managed in accordance with 75.265(i)(1)-(14) <i>see page 3</i>			(g)(1)(iii)
		X		Containers clearly marked with accumulation date and visible for inspection <i>REPEAT VIOLATION</i>			(g)(1)(iv)
X				Records retained at designated location for 20 years			(h)
X				Quarterly reports submitted to the Department			(i)
	X			Exception reporting procedures followed			(j)
	X			Hazardous waste disposal plan, if required <i>WASTES ARE RECYCLED/RECLAIMED</i>			(k)
	X			Spill reporting procedures followed <i>NO SPILLS</i>			(m)(1)
	X			Preparedness, Prevention and Contingency Plan and implemented <i>PLAN DEVELOPED NOT YET REVIEWED</i>			(m)(5)
	X			Special requirements followed for international shipments			(o)
				Personnel training program (75.265(f))			(g)(1)(6)
							(g)(1)(iii)

Hazardous Waste Inspection Report
TSD Facilities — Storage (Containers)

Avery/Soabar

1—No Violation Observed				2—Not Applicable	3—Not Determined	4—Non-Compliance	
Status				REQUIREMENT			Chapter Citation
1	2	3	4				75.265
X				Containers managed to prevent leaks and spills.			(q)(1), (4)
X				Containers are compatible with waste stored.			(q)(2)
			X	Containers are closed during storage. CORRECTED DURING INSPECTION			(q)(3)
X				Container storage area inspected weekly for leaks, deterioration, etc.			(q)(5)
X				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.			(q)(6)
	X			Satisfactory procedures followed for handling incompatible wastes.			(q)(7), (8)
	X			Incompatible wastes separated or protected from other materials.			(q)(9)
			X	Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.			(q)(10)
			X	Containment system has impervious base free of cracks. (OUTDOOR AREA)			(q)(10)(i)
			X	Efficient drainage provided from base to sump or collection system. " "			(q)(10)(ii)
			X	Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater. " "			(q)(10)(iii)
		X		Run-on into containment system prevented.			(q)(11)
		X	X	Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow. (OUTDOOR AREA)			(q)(12)
X				At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.			(q)(13)
X				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria (≤6 feet high, 8 ft x 8 ft, 5-foot surrounding aisle space). (OUTDOOR AREA USED)			(q)(14)(i)
			X	Outdoor accumulation of ignitable and reactive waste with less than 20% solids meets height and configuration criteria (≤9 feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).			(q)(14)(ii)
			X	Setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.			(q)(14)(iii)
			X	Ignitable or reactive hazardous waste meets height and configuration criteria (≤9			(q)(14)(iv)

Hazardous Waste Inspection Report
Comments - Part C

Date of Inspection 1-31-90 Identification Number PAD002277150
Company, Installation Name Avery / Soabar Products Group
County Phila. Municipality Phila.

Non-Compliance Items:

75.262(g)(1)(iii) } The facility has not
and 75.265(g)(10,14,12) } provided proper con-
tainment for its
hazardous waste containers. The storage
areas used prior to the Department's first
inspection (1989) and since that inspection
(and subsequent Notice of Violation) are in
~~non~~ non-compliance with the Department's Rules
and Regulations. The Department recom-
mends future use of the company's
existing solvent/product storage room
for the storage of its hazardous wastes.
THIS REQUIREMENT WAS PUBLISHED IN THE
12/10/88 ISSUE OF THE PA BULLETIN, AND IS
A "PAST DUE" VIOLATION AS NOTED IN THE
DEPARTMENT'S NOTICE OF VIOLATION.

75.262(g)(1)(iv) - One hazardous waste container was
noted without an accumulation date.
THIS IS ALSO A "PAST DUE" VIOLATION.

This report is official notification that a representative of the Department of Environmental
Bureau of Waste Management, inspected the above installation. The findings of this
inspection are listed above. Violations which were uncovered during the inspection
are listed below. The Department reserves the right to re-examine the results of laboratory

Hazardous Waste Inspection Report
Generators - Part A

Date of inspection 1/11/93 Time start 1:00 Time finish 2:30
 Name of inspector Tom McElhath
 Company, installation name Avery Soabur Products Group
 Location 7722 Dungan Rd Phila PA 19111
 County Phila Municipality Phila (Fox Chase)
 Identification number PAD002277150
 Name of responsible official Alonzo Humphrey
 Title Safety and Environmental Manager
 Mailing address same as above
 Area code and telephone number (215) 725-4700
 Name of person interviewed A. Humphrey
 Title _____
 Mailing address (if different from above) _____
 Area code and telephone number _____

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim

outside company
recycles onsite

2. Amount of hazardous waste produced:

- a. > 1000 Kg kg./mo.
 b. _____ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
F005, 0214	Petro Chem Processing	Detroit MI 48214
D001, D039	Safety Kleen	Fairless Hills PA 19030
D006	Safety Kleen	Clayton NJ 08312

Hazardous Waste Inspection Report
Generators - Part B

1- No Violation Observed				2- Not Applicable	3- Not Determined	4- Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available		.11
X				Identification number		.12(a)
X				Hazardous waste shipments offered only to licensed transporters		.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g)
X				Manifests routed properly and within time limits (7 days)		.23(e) or (f)
X				Proper U.S. DOT shipping containers or packages		.30(1)
X				Shipping containers marked and labeled according to U.S. DOT		.30(2)
X				Containers of 110 gal. or less marked with required PA label		.30(3)
		X		Placards offered to transporter		.33
X				Wastes accumulated on-site for less than 90 days		.34(1)
X				Wastes stored in proper containers and properly marked and labeled		.34(2)
X				Containers managed in accordance with 265.171-.177		.34(3)
X				Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
X		X		Exception reporting procedures followed		.42
X				Hazardous waste disposal plan, if required		.45
X				Spill reporting procedures followed		.46(a)
X				Preparedness, Prevention and Contingency Plan and implemented		.46(e)
	X			Special requirements followed for international shipments		50.53.55.60
X				On the job or classroom personnel training program 265.16		.34(a)(5)
X				Drum accumulation area inspected weekly as per 265.174		.34(a)(3)

2/3

Inspection Report Comments

Date of Inspection 1/11/93 Identification Number PADO02277150
Company/Facility/Site Name Avery Soabar Products Group

I conducted an inspection at Avery Soabar Products Group at 7722 Dungan Rd in Phila. Permission to inspect was granted by Alanzo Humphrey - Safety and Environmental Manager.

Avery Soabar is a paper converter. They cut and process labels and tags. The hazardous wastes generated are largely inks and spent solvent waste.

They typically generate about 10-55 gallon drums of hazardous waste per month and ship on a monthly basis. There are 8 drums of hazardous waste currently onsite dating back to the end of October 1992.

Comments - Access should be kept clear to the spill kit in the storage area.

No Violations noted at this time.

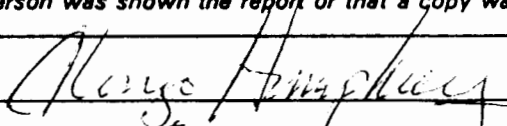
In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

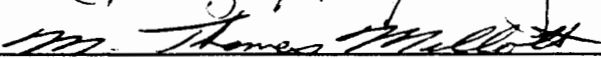
Person Interviewed (signature)



Date

1/11/93

Inspector (signature)



Date

1/11/93Page 3 of 3

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

United States Environmental Protection Agency
Washington, DC 20460

Form Approved OMB No. 2050-0028, Expires 9-30-88
GSA No. 0246-EP4



Notification of Hazardous Waste Activity

Please refer to the instructions for filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C
C

Installation's EPA ID Number

Approved

Date Received
(yr. mo. day)

C
F

T/A C
T

I. Name of Installation

AVERY SOABAR PRODUCTS GROUP

II. Installation Mailing Address

Street or P.O. Box

C
3

7722 Dungan RD.

City or Town

State

ZIP Code

C
4

Philadelphia

PA 19111

III. Location of Installation

Street or Route Number

C
5

7722 Dungan RD.

City or Town

State

ZIP Code

C
5

Philadelphia

PA 19111

IV. Installation Contact

Name and Title (last, first, and job title)

Phone Number (area code and number)

C
2

Humphrey Alonzo

SAFETY
ENG.

215 725 4760

V. Ownership

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C
R

AVERY

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

☒ 1a. Generator

☐ 1b. Less than 1,000 kg./mo.

☐ 2. Transporter

☐ 3. Treater/Storer/Disposer

☐ 4. Underground Injection

☐ 5. Market or Burn Hazardous Waste Fuel

(enter 'X' and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

☐ 6. Off-Specification Used Oil Fuel

(enter 'X' and mark appropriate boxes below)

☐ a. Generator Marketing to Burner

☐ b. Other Marketer

☐ c. Burner

☐ 7. Specification Used Oil Fuel Marketer (or On site Burner)

Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler

☐ B. Industrial Boiler

☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air

☐ B. Rail

☐ C. Highway

☐ D. Water

☐ E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☐ A. First Notification

☒ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

PA D002277150

C

W

7A

X. Description of Hazardous Wastes (continued from front)**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F003	2	3	4	5	6
7 F005	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
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E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24)☒ 1. Ignitable
(D001)☒ 2. Corrosive
(D002)☐ 3. Reactive
(D003)☐ 4. Toxic
(D000)**XI. Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Name and Official Title (type or print)

Date Signed

GCN

EPA

Department of Environmental Resources

1875 New Hope Street
Morristown, PA 19401
215 270-1948

June 7, 1989

Mr. D. Kent Tippy, Group Vice-President
Avery/Soabar Products Group
7722 Dungan Road
Philadelphia, PA 19111

Re: Hazardous Waste Inspection
PAO 802277150
May 17, 1989
Philadelphia

NOTICE OF VIOLATION

Dear Mr. Tippy:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 75.260 through 75.267 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

- 75.267 The company originally notified as a generator of D000, D001, and D003, under the name Soabar Division of Avery International, and is now known under a different name, generating different wastes. Avery/Soabar should re-notify both EPA and DER, giving your new name and correct waste numbers. This should be corrected upon your receipt of this Notice.
- 75.262(b) There were five gallon pails of chemical wastes which have not been determined and appropriately labeled to accurately identify their contents. In addition, the hazardous waste determinations have not been properly documented; "Hazardous Waste Determinations" should be written and filed (along with any associated lab data) into the facility's operating record. This should be corrected by June 30, 1989.
- 75.262(d) Written authorizations were not available from Safety-Kleen and Industrial Solvents and Chemical Company. This should be corrected upon your receipt of this Notice.
- 75.262(g)(1)(iii)
75.262(e)(5) Container storage area weekly inspections are not being performed for leakage and corrosion, according to 40.

Mr. D. Kent Tippw, Group Vice-President
June 7, 1989

- 2 -

- 75.265(q)(5) Summary. In addition, the weekly inspections are not being logged in a weekly inspection log, as required by Section 75.265(e)(5). This should be corrected upon your receipt of this Notice.
- 75.262(g)(1)(iv) The dates placed on the drums are not designated as accumulation dates on the drums. This should be corrected upon your receipt of this Notice.
- 75.262(g)(1)(v)
75.265(f) The hazardous waste personnel training program has not been fully developed and documented. This should be corrected by June 30, 1989.
- 75.262(g)(1)(v)
75.262(m)(5)
75.265(l)(4) The PPC plan has still not been fully developed and implemented. This should be accomplished in accordance with the Department's March 23, 1989 PPC plan review letter by June 30, 1989.
- 75.262(e)(17) Numerous manifests (Copy 8) are too faint to read. All 8 copies of manifests should be corrected, complete and readable prior to acceptance by the hazardous waste transporter. This should be corrected immediately.
- 75.262(g)(1)(v)
75.265(q)(10-14) The facility should provide the following for container storage of hazardous wastes by August 30, 1989:
- 75.265(q)(10) A properly designed and constructed containment system.
- 75.265(q)(11) Prevention of run-on into the containment system.
- 75.265(q)(12) Liquids (wastes and/or precipitation) to be removed from the sump with sufficient frequency to prevent overflow.
- 75.265(q)(14) Adherence to proper waste container configuration, height, and aisle space requirements.
- 75.265(q)(14)(ii) Design, construction and maintaining ignitable waste container storage at least forty (40) feet from the building (NEPA requirement), and at least fifty (50) feet from the nearest property line, as required in Section 75.265(q)(6), and

Mr. D. Kent Tippy, Group Vice-President
June 7, 1989

- 3 -

by the RCRA, also. These requirements became effective on December 10, 1988.

Act 97/Section 403(b)(2) Hazardous waste drums (and pails, if applicable) are not being labeled to accurately identify their contents. This should be corrected upon your receipt of this Notice.

Note: Please submit documentation regarding the rag-cleaning service along with your response to this Notice.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at the above number.

Very truly yours,

ROBERT ZANG
Waste Management Specialist

cc: USEPA/RCRA Enforcement
Division of Compliance & Monitoring
Philadelphia Health Department - Mr. Zipin
Mr. Pagano
Mr. Humphrey
Re 30(DCN4)157.8/.2

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215 279-1948

GEN

March 23, 1989

Mr. John R. Lewis
Soabar, Div. of Avery International
7722 Ringan Road
Philadelphia, PA 19111

Re: Bureau of Waste Management
PPC Plan Review
Completed March 10, 1989
PA0002277150

Dear Mr. Lewis:

The Department has just briefly examined your plan, and found it to be fairly well developed. However, the plan has not been organized according to the Department's PPC Plan guideline document (see page 2: "Table 3 - Elements and Format of a PPC Plan").

Please reorganize your plan, following Table 3, and be sure to include all of the required information discussed in the guideline document (e.g. - topo map, detailed site drawing including property boundaries/complete labeling of all areas/chemical and waste storage/other pertinent information).

Also, please send two copies of your revised plan to my attention at your earliest convenience, and a second, detailed review of your plan will be conducted.

Very truly yours,

ROBERT ZANG
Waste Management Specialist

cc: Mr. Zang(2)
Re 30 (SAC24)82.4



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

PAD 00 227 7150

INSTALLATION ADDRESS

Mr. George Schupp
Soabar Division of Avery International
7722 Dungan Road
Philadelphia, PA 19111

7722 Dungan Road
Philadelphia, PA 19111

Hazardous Waste Quantity Notification

Business Name Sorbar, Div. of Avery International
Business Address 7722 Dungan Rd.
Phila. PA. 19111
EPA ID Number PAD002277150

Hazardous Waste Generated

0 - 100 kg/month ☐

100 - 1000 kg/month ☐

1000 kg/month or more ☒

George T. Schupp Jr.
Signature and Title Safety Mgr.



Official Business
Penalty for Private Use
\$300

FIRST-CLASS MAIL
POSTAGE & FEES PAID
EPA
PERMIT NO. G-35

United States
Environmental Protection
Agency

Washington DC 20460

JOHN A ARMSTEAD
VA/WV SECTION (3HW31)
US EPA REGION III
841 CHESTNUT ST.
PHILADELPHIA, PA 19107

EPA Form 5180-11 (5-79)

I.D. - FOR OFFICIAL USE ONLY

5	4	3	2	1	0	0	2	2	7	7	1	5	0	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)
X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

Donald F. Bell
Manager Converting

DATE SIGNED

8/15/80